

July 14, 2006

Minerals Management Service  
PRG-HQ-0005

Thank you for the opportunity to comment on the Cape Wind Energy Project.

Until your agency took over the permitting process, the Army Corps had done an admirable job on this project under very difficult circumstances. Their DEIS plainly shows that the benefits from this project abundantly outweigh the negatives, and that inexpensive, reliable electricity can be provided on a large scale in an environmentally responsible way. This is why I whole-heartedly support this project, and want to see its construction in as timely manner as possible so that I and every other Massachusetts citizen can realize the tangible benefits that the Army Corps has outlined. Moving the process forward quickly yet thoroughly cannot be overstressed, as our nation is confronting a mounting energy crisis and our planet is confronting a possibly catastrophic climate crisis. We need these types of projects now, not in five or ten years, but now.

Most of my concerns with the Army Corps' DEIS regard the simplistic arguments that opponents have been airing against the project from day one. Their propaganda has unfortunately largely precluded discussion of the real issues at play. I hope you can add a few sections to analyze some of their arguments for your updated DEIS, both to show that you are paying attention to their concerns and to point out the frivolity of some of these arguments (I will bold my essential suggestions to make things easier for you).

For example, **a brief primer on the history of the private use of public lands in the United States would seem to be in order, most importantly a listing of the private interests and industries that are presently profiting off the public resource that is Nantucket Sound, including the impacts, both positive and negative, of those interests and industries.** Since opponents continue to characterize the project as a private take-over and/or industrialization of a pristine, unspoiled public resource, this primer would show that these particular arguments against Cape Wind, while applicable, are not being applied fairly - or in the case of the Sound being pristine, not based in fact. For example, ferries are legally allowed to dump their human waste, fishing boats rake the seabed in order to haul in their catch of a non-renewable resource, and tour boats (and pretty much all boats for that matter) exhaust unburned gasoline from their horribly inefficient engines, all while profiting privately off the public resource that is Nantucket Sound. Cape Wind will undoubtedly have adverse impacts, but blatant hyperbole like these arguments should be exposed as such in your Impact Statement.

Another popular argument against Cape Wind highlights the Electrical Service Platform which will contain approximately 40,000 gallons of transformer oil. **While I understand that the Spill Prevention Control and Countermeasure Plan is not normally included in the DEIS and/or FEIS, perhaps you could nonetheless give a brief analysis of the relative probabilities and impacts from an accident on Cape Wind's ESP versus an accident from continuing with 'business as usual,' i.e. another oil**

**spill.** This should start with a comparison of the relative toxicity of the mildly irritating transformer oil on the ESP to the highly toxic heavy fuel oil #6 that is burned in the Mirant Canal Station power plant in Sandwich. Your analysis should then compare the probability of another devastating oil spill, like the 98,000 gallons of this heavy fuel oil that was spilled in Buzzards Bay in the spring of 2003, to the probability of an accident on Cape Wind's ESP. Finally, since that heavy fuel oil will be the most likely offset from Cape Wind (although I realize that we won't know for sure what power plants - and therefore what fossil fuels - will be offset until the plant is operational, this plant seems to be the most likely one to be powered down as direct result of Cape Wind's operation), perhaps you could estimate the reduced probability of a heavy fuel oil spill that Cape Wind would represent, through the offset of nearly 100 million gallons of such oil, and compare that figure to the probability of an ESP accident. Such an analysis would show clearly the relative risks and/or impacts to Nantucket Sound of continuing with business as usual versus the construction of Cape Wind, at least pertaining to potential spills.

I would also like to comment regarding the oft-quoted 364 birds per year that the Army Corps predicted would be killed in collisions with the turbines. I cannot speak to the methodology that they used to calculate this number, but I can point to the fact that the Horns Rev wind farm in Denmark has not yet recorded a single bird kill, and that in fact populations of ducks and other birds have significantly increased there because the monopoles have acted as underwater reefs which attract shellfish and other aquatic life – a result which you also predict for Cape Wind - on which these birds feed. While such an increase is probably in the very short term simply a relocation of these birds from other, less sustainable areas, eventually **I would think in the long term we should see increased survivability rates for newborn birds, as they would have more food to nourish themselves with, which of course would translate to increased populations period.**

In addition, I have not heard anyone speak of the decreased avian mortality rate - or for that matter for all land-based wildlife in the region – that would almost certainly result from Cape Wind due to the decrease in air pollution. The DEIS predicted that every year 5,000 asthma attacks and 12-15 premature human deaths would be prevented. I don't know if there is any data available for birds and other wildlife from which to compile complimentary figures, but it obviously stands to reason that there will be similar benefits for these creatures, since we all breathe the same air, and less air pollution inherently means less cardio-pulmonary disease. For example, since birds outnumber humans by several orders of magnitude (I must admit I have no clue what the actual ratio is), it would not be unreasonable to at first guess that the prediction of 12-15 premature human deaths would likewise be orders of magnitude greater for premature avian deaths. In the absence of any such data corresponding to wildlife, even a simplistic analysis like this (I would hope you would put slightly more effort into it) would acknowledge that **all creatures, not just humans, will benefit from the decreased air pollution Cape Wind will offer, and that these statistics may very well completely offset any direct fatal impacts such as avian turbine collisions.**

I hope these comments will be helpful. Once again, I would like to state my whole-hearted support for this innovative project, which will bring enormous benefit for our state, and indeed our nation, with so little impact. It is abundantly clear that this project's construction is in the public interest. But there is far more at stake here than just one project. **I believe that climate change is by far the most serious threat that we face as a nation and as a planet, and Cape Wind is the bellwether as to whether we will act to protect our children from the myriad disruptions that the rapid warming of our planet will bring in the coming decades, or whether we will succumb to those consequences with a sigh and a whimper.** If approved and constructed for the right reasons, I believe that Cape Wind will usher in the new energy revolution, which will bring incalculable benefit to both our state and our nation. If it is killed for the wrong reasons, however, the industry will likely be set back for years if not decades, effectively sentencing future generations to more serious disruptions. **Because of this likely radical swing in future scenarios, this project absolutely must go forward, with or without the consent of our elected officials, so that we as a society can begin to salvage what future we can for our children before it is truly too late.**

Sincerely,

Erik Gehring  
87 Walter Street  
Roslindale, MA 02131  
617-594-6660  
[erik@erikgehring.com](mailto:erik@erikgehring.com)